

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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June 19, 2020

By ECF

Honorable Judge Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
June 22, 2020

Re: United States v. Tiquan Reese, 19 Cr. 904 (RA)

Dear Judge Abrams:

I write, without objection from the Government or Pretrial Services, to request that you modify the terms of Tiquan Reese's bail to permit his travel within the District of New Jersey. Mr. Reese was released on bail on October 17, 2019 with agreed upon conditions including travel limited to the Southern and Eastern Districts of New York. He has had no issues on pretrial release over the past eight months. He now requests that the terms of his bail be modified to allow his travel within the District of New Jersey, where his sister, niece, best friend, and girlfriend's father all reside.

As noted, neither the Government nor Pretrial Services objects to this request. Thank you for considering it.

Respectfully submitted,

/s/ Ariel Werner

Ariel Werner
Assistant Federal Defender
Counsel for Tiquan Reese

CC: AUSA Danielle Kudla
U.S. Pretrial Officer Keyana Pompey